

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

LEON WEINGRAD, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

IBAN GLOBAL LLC

and

LIVEFREE EMERGENCY RESPONSE,
INC. D/B/A LIFE BEACON

Defendants.

Case No. 24-4212

JURY TRIAL DEMANDED

**[PROPOSED ORDER GRANTING]
PLAINTIFF'S MOTION TO COMPEL AND
TO DEEMING ADMISSIONS ADMITTED**

AND NOW, this _____ day of _____, 202__, upon
consideration of the Plaintiff's Motion to Compel Motion to Deem Admissions Admitted,
this Court does hereby ORDER, DECREE, and ADJUDGE:

- Defendant shall file verified responses, without objections, to the Plaintiff's first set of Jurisdictional Interrogatories within seven days of this order.
- Defendant shall produce all documents, without objections, to the Plaintiff's first set of Jurisdictional Requests for Production within seven days of this order.
- Plaintiff's first set of Jurisdictional Requests for Admission are deemed Admitted.

- Plaintiff shall be permitted until _____ to respond to the Defendant's motion upon production of the ordered discovery.

J.